



Enhancing Climate Resilience of the Urban
Landscapes and Communities in Thimphu-Paro
Region of Bhutan
(2025-2031)

GRIEVANCE REDRESSAL MECHANISM
(June 2025)

Project Management Unit
GEF Project
Department of Human Settlement
Ministry of Infrastructure and Transport
Royal Government of Bhutan
Thimphu, Bhutan

ACRONYMS

ACC	Anti-Corruption Commission
APA	Annual Performance Agreement
DGFP	Dzongkhag Grievance Focal Point
DPO	Dzongkhag Planning Officer
DHS	Department of Human Settlement
MoIT	Ministry of Infrastructure and Transport
GFP	Grievance Focal Point
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
PMU	Project Management Unit
RCSC	Royal Civil Service Commission
RP	Responsible Parties
UNDP	United Nation Development Programme

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BACKGROUND

In pursuance to an executive order from the Anti-Corruption Commission (ACC) on February 20, 2014, the Grievance Redressal Mechanism (GRM) was instituted in all government agencies including the local governments as part of change management plan to promote professional conduct of the employees for a fair, equitable and conducive work environment. It aims to provide a formal platform for the employees to express their grievances without fear of retribution. It is a resolve to deal with grievances in a timely, transparent, consistent, and effective manner. Thus, the procedures and the roles and responsibilities required by the GRM are incorporated into the system. In accessing the mechanism, several platforms have been introduced such as online and in-person. Its performance indicators and targets are developed and monitored through the Annual Performance Agreement (APA).

During the implementation of any project, a person or a group of persons can be adversely affected, directly or indirectly by the project activities. The grievances that may arise can encompass the social and cultural issues such as eligibility criteria and entitlements, disruption of services, temporary or permanent loss of livelihoods and so forth. It may also encompass the environmental issues such as excessive dust generation, damages to infrastructure due to construction- related vibrations or transportation of raw material, noise, traffic congestions, decrease in quality or quantity of the private and public surface ground water resources during irrigation rehabilitation, damage to home gardens and agricultural lands, and so forth.

The GRM has been designed to act as a problem-solving mechanism but not a substitute for the legal processes. It shall, as far as practicable, resolve complaints and/or grievances on terms that are mutually acceptable to all the parties involved. When lodging a grievance, all parties must act in good faith at all times and not attempt to delay and/or hinder any mutually acceptable resolution. In order to ensure successful implementation of the project, it is critical to address the grievances that may arise during the implementation process in a timely and effective manner.

All complaints and/or grievances regarding the social and environmental issues can be lodged in any mode convenient to the aggrieved party (in-person, phone, grievance box or in writing to the Dzongkhag, Thromde, District, UNDP, Ministry of Infrastructure and Transport or the Contractor). A key aspect of the GRM is the

requirement for the Project Management Unit (PMU) under the MoIT and the Contractor to maintain a register of grievances received at the respective project site offices.

All aggrieved persons or parties shall be treated with utmost confidentiality. Every effort shall be made by the MoIT/PMU and the Contractor to resolve the grievances mutually acceptable to the parties involved. However, there may arise issues that could be more complex and cannot be solved through the project-level mechanisms and require referral to the Grievance Redressal Committee (GRC). It shall be the responsibility of the MoIT to solve the grievances through a process that is reliable and robust.

OBJECTIVES

SCOPE AND APPLICATION

The GRM shall apply to all the population in the two Dzongkhags: Thimphu and Paro and the stakeholder agencies such as the Ministry of Infrastructure and Transport (MoIT).

ELIGIBILITY FOR GRM

The following are the criteria that shall qualify the grievances fThe establishment of the GRM underscores the following objectives:

- Resolve grievance of any individual and/or community related to the project implementation in an efficient, unbiased, transparent, timely and cost-effective manner;
- Provide a platform for the aggrieved person/community to communicate their grievance through an appropriate process;
- Provide an accessible, rapid, fair and effective response to the stakeholders concerned, especially the vulnerable groups who lack access to formal legal regimes;
- Encourage mutually acceptable resolution of the grievance as they arise; and
- Not delay or hinder any mutually acceptable resolution.

or the redressal:

1. Perceived negative economic, social or environmental impact on an individual and/or group, or the foreseeable concern about the potential to cause an impact;
2. Clearly specify the type of impact that had occurred or has the potential to occur and explanation of how the project caused or may cause such an impact; and
3. Individual or group filing grievance is impacted, or at the risk of being impacted; or the individual or group filing grievance demonstrates that it has the authority from an individual or group that have been or may potentially be impacted to represent their interest.

GRIEVANCE REGISTER

A grievance register each shall be maintained by the following:

- Contractor;
- Dzongkhag Planning Officer at the Dzongkhag;
- Component Managers at the agency; and
- PMU.

Any grievance shall be registered with the following information:

- Time, date and nature of grievance;
- Type of communication (Telephone, letter, personal contact);
- Name, contact address and contact number;
- Response and investigation undertaken as a result of lodging the grievance; and
- Actions taken and name of the person taking the action.

GRIEVANCE REDRESSAL PROCEDURES

First Tier: Thromde, Line Manager/Officer/Contractor/PMU Level Reporting

- Aggrieved individual or community shall first discuss the grievance with the focal officer at the Thromde or with the Line Managers, Focal Officers, Contractor and the PMU;
- Any grievance shall be recorded in the grievance register by the Line Manager/Focal Officer/ Contractor/PMU with the information necessary for registration;
- Any grievance at this stage shall be resolved within 10 working days;
- The aggrieved person or party shall be notified of the proposed outcome through a formal letter; and
- Where possible, the project team shall seek to resolve the grievance as soon as possible and avoid escalation. However, where a grievance cannot be readily resolved, then it must be immediately transferred to the next level.

Second Tier: Dzongkhag Level Reporting

- If the grievance cannot be resolved at Tier 1, the aggrieved individual or community shall report it to the grievance redressal focal point at the Dzongkhag (Dzongkhag Planning Officer) for resolution at the Dzongkhag Grievance Redressal Committee;
- Any grievance shall be recorded in the grievance register by the focal officer at the Dzongkhag with the information necessary for registration;
- The duration to resolve the grievance shall be completed within 10 working days;
- If the social safeguard and gender officer feels that adequate solutions can be established within the next five working days, the officer can recommend retaining the grievance at the first level by informing the aggrieved accordingly;
- The aggrieved person or party shall be notified of the proposed outcome through a formal letter;
- The committee shall seek to resolve the grievance as soon as possible and avoid escalation. However, where a grievance cannot be readily resolved to the satisfaction of the aggrieved, then the grievance shall be immediately referred to the Project Board; and
- The Committee at the second tier can also choose to refer the grievance to the relevant agency/ministry prior to escalation to the project board, if deemed appropriate for resolution.

Third Tier: Ministry/Agency Level Reporting

- If the grievance cannot be resolved at the Second Tier and requires support from the relevant central agencies, then it shall be transferred to the relevant ministry or agency for deliberation and pass resolution. Further, any grievance that arises from within the Ministry or agency while executing the activities and interventions of the project shall be recorded;
- Any grievance shall be recorded in the grievance register by the focal officer (Component Manager) with the information necessary for registration;
- Any grievance at this tier shall be resolved and communicated to the aggrieved within 10 working days;
- The aggrieved person or party shall be notified of the proposed outcome through a formal letter; and
- Any grievance that cannot be resolved at this tier shall be immediately referred to the project board for resolution.

Fourth Tier: Project Board Level Reporting

- The grievance which cannot resolved at the Second Tier shall be immediately referred to the project board;
- The grievance which does not require referral to the Second-Tier referral shall be directly referred to this tier;
- The resolution shall be communicated to the aggrieved within 10 working days; and
- The aggrieved person or party shall be notified of the proposed outcome through a formal letter.

STRUCTURE OF GRIEVANCE REDRESSAL COMMITTEE (GRC)

The following presents the structure of the GRC at various levels:

Thromde Level	•Thrompon (Chair) •Member and GRM Focal Officer (TBD)
Dzongkhag Level	•Dzongdas (Chair) •Dzongrab (Vice Chair) •Relevant Gup (Member) •Environment Officer (Member) •Legal Officer (Member) •Relevant Sector Head (s) (Member) •Dzongkhag Planning Officer (GRM Focal Officer)
Ministry/Agency Level	• Director/Director General of the relevant Department(s) • Chief(s) of the relevant Divisions • Relevant Officers from other Divisions • Relevant Chiefs/Focal Officers from the Regional Offices • Project Focal Officer • Finance/Accounts Officer

TERMS OF REFERENCE FOR THE GRM COMMITTEES

The composition of the GRC must be gender balanced. The presence of women representatives in the GRM committee must be ensured to promote easy access and confidentiality in GBV cases.

The Committees are to undertake the following roles:

- Provide support to the aggrieved persons in resolving their grievance;
- Prioritize the grievance and resolve at the earliest;
- Provide information to the PMU and MoIT on serious grievances at the earliest opportunity;
- Coordinate with the aggrieved person or party and obtain proper and timely information on the resolution worked out for the grievance;
- Analyze the grievances that normally occur and advise the contractors, responsible parties and the PMU on remedial actions to avoid further occurrences;
- Maintain proper record of the minutes of the meeting;
- Communicate the proposed outcome to the aggrieved formally; and
- Ensure effective implementation of the GRM.

TERMS OF REFERENCE FOR THE PMU

- Coordinate the formation of the GRC before the commencement of the project implementation;
- Facilitate the resolution of the grievances within the PMU;
- Create awareness of the GRM amongst the stakeholders, responsible parties and public;
- Assist in redressal of all grievances by coordinating with the parties concerned;
- Maintain record of the grievances lodged and redressals made;
- Monitor the implementation of the outcomes of the grievances resolved; and
- Maintain progress reports on a monthly/quarterly basis.

Grievance can be transmitted to the PMU to the following address:

Project Manager
Project Management Unit, Department of Human Settlement
Ministry of Infrastructure and Transport (MoIT).
Ground Floor, MoIT Building, 194 Chang Lam SE, Thimphu 11001 Bhutan
P.O Box No. 791 Phone: +975 2 335799. Email: infodhs@moit.gov.bt

Stages of the Grievance Redressal Mechanism (INSERT FLOW DIAGRAM HERE)

SUBMITTING A GRIEVANCE

(i) Who can submit a grievance?

A grievance can be submitted by any individual or group of individuals that believes it has been or will be harmed by the Project.

If a grievance is to be lodged by a different individual or organization on behalf of those said to be affected, the Complainant must identify the person/people on behalf of who the complaint is submitted and provide written confirmation by the person/people represented that they are giving the Complainant the authority to present the complaint on their behalf. The GRM will take reasonable steps to verify this authority.

(ii) How is the grievance submitted?

The GRM will maintain a flexible approach with respect to receiving grievances in light of known local constraints with respect to communications and access to resources for some stakeholders. A grievance can be transmitted to:

Project Manager: Sonam Y. Rabgye, SES Focal, UNDP CO Bhutan
Phone: +975 2 322424
UNDP Project Assurance Function:

A Grievance (Complaints) Box will also be set up at a dedicated location at the Thromde and Dzongkhag levels for receiving grievances physically from stakeholders. Information related to the name of the GRM Focal Officer and Contact Number at each level will be placed on the box and this information would be disseminated to all stakeholders during the consultation process. The GRM Focal Officer at the respective levels would be responsible to check the box once a week and register the grievances received in the grievance log and proceed towards addressing the grievances according to the workflow mentioned in the GRM.

In addition to the Project's GRM, UNDP's accountability mechanisms will be available to the project stakeholders. These other channels will be communicated to stakeholders alongside information pertaining to the Project's GRM. These mechanisms may be accessed via the channels described below, or through direct communication with the PMU, as facilitated by the ongoing stakeholder engagement plan.

UNDP's Accountability Mechanisms

Social and Environmental Compliance Unit (SECU)

UNDP established SECU to ensure accountability to individuals and communities. SECU responds to complaints that UNDP may not be meeting its social and environmental commitments. Any person or community who believes the environment or their wellbeing may be affected by a UNDP-supported project or programme may file a complaint. A representative, such as a civil society organization, may also file a complaint on behalf of affected communities. People who file complaints may request that SECU protect their names and identities.

Stakeholder Response Mechanism – Helping parties resolve disputes

The Stakeholder Response Mechanism (SRM) helps project-affected stakeholders, governments and other partners jointly resolve concerns and disputes. It is available when Implementing Partner and UNDP project-level stakeholder engagement processes have not successfully resolved issues of concern. UNDP Country Office management normally leads in Stakeholder Response; a headquarters function will also support the SRM.

Any person or community potentially affected by a UNDP-supported project may file a request for a response from the SRM, if they have raised their concerns with Implementing Partners and/or with UNDP through standard channels for stakeholder consultation and engagement and have not been satisfied with the response.

If a person or community has a concern about the ability of the UNDP Country Office to respond fairly and effectively to the request, they have the option to file the request directly with the SRM at UNDP Headquarters in New York. Requests can be sent to the SRM through the Internet or through the mail.

Where to File the Request

Aggrieved stakeholders can submit grievances to SECU or requests to SRM through the UNDP Country Office or directly to UNDP Headquarters in New York. Requests can be made through online, email, toll-free telephone hotline (in any language), mail, or an in-person meeting with the Country Office Designee,

- **By Phone Call** (costs are incurred by caller) using 001 (917) 207 4285. Skype is an affordable way to place such a call.
- **Submitting a Request by Post** (in any language) to: Attn: SECU/SRM, OAI, UNDP, 1 U.N. Plaza, 4th Floor New York, NY USA 10017
- **Submitting a Request by Email** (in any language) to: secuhotline@undp.org / stakeholder.response@undp.org
- **By Social Media Apps.** Complaints or grievances can be sent through WhatsApp, Viber and Signal using 001 (917) 207 4285, or through our WeChat account @SECUSR

(iii) What information should be included in a complaint?

The Grievance should include the following information:

- a. the name(s) of the person/people submitting the complaint (“the Complainant”);
- b. a means for contacting the Complainant (email, phone, address, other);
- c. if the submission is on behalf of those alleging a potential or actual harm, the identity of those on whose behalf the complaint is made, and written confirmation by those represented of the Complainant’s authority to lodge the complaint on their behalf;
- d. a description of the potential or actual harm;
- e. names of the individual(s) or institutions responsible for the risk/harm (if known), and the location(s) and date(s) of harmful activity (if Complainant states that harm has already occurred);
- f. what has been done by Complainant thus far to resolve the matter;
- g. whether the Complainant wishes for their identity to be kept confidential; and
- h. the specific response requested from the GRM.

However, Complainants are not required to provide all of the information listed above. Initially, the Complainant need only provide enough information to determine eligibility. If insufficient information is provided, the GRM has an obligation to make a substantial, good faith effort to contact the Complainant to request whatever additional information is needed to determine eligibility, and if eligible, to develop a proposed response.

Complainants may request and receive confidentiality. With the Complainant’s agreement, the GRM will refer requests alleging fraud or corruption to the appropriate offices within UNDP and to the relevant partner(s). For complaints regarding sexual exploitation, abuse or harassment (SEAH) the GRM will ensure complete confidentiality and may refer the complainant to reportmisconduct@undp.org.

As a result of the sensitivity regarding grievances related to GBV or SEAH, any incidence of this nature can be managed through the UNDP SRM. While grievances related to SEAH/GBV can still be processed through the Project GRM as described above, the UNDP SRM is available and will operate in a manner that ensures the

safety of the survivor. Any grievances related to GBV or SEAH as a result of project activities will be approached with the following core considerations:

- i. automatic eligibility of grievances;
- ii. anonymisation and/or prioritization of protection and privacy of victim in all official documentation and processes;
- iii. prioritization of support services for victims as available. Support will be provided for as long as required, and at the expense of the project if so required;
- iv. investigation of root cause of grievance and appropriate disciplinary action undertaken;
- v. monitoring and reporting of all SEAH/GBV grievances in a separate and anonymised register alongside the GRM register; and
- vi. Adequate restitution and/or reporting of event and perpetrator to appropriate legal bodies/institutions (as required by law).

As per the considerations outlined above the safety of the victim/survivor and the need to provide support to them is prioritised above all other considerations. Any NGO or other organisation providing this type of support to project affected parties will need to be shortlisted by the PMU at project's cost. The NGO is to have a history of working in the region and proven specialised expertise in supporting survivors of GBV and SEAH (at a minimum).

Maintaining Communication and Status Updates

Summary documentation of each grievance will be available for review by the Complainant and other stakeholders involved in the complaint, or their designated representative(s). Appropriate steps will be taken to maintain the confidentiality of the Complainant if previously requested.

The GRM will provide periodic updates to the Complainant regarding the status and current actions to resolve the grievance. Not including the acknowledgment of receipt of the complaint, such updates will occur within reasonable intervals (no less frequent than every thirty (30) days).

Protection from Reprisal and Retaliation

UNDP seeks to identify, reduce and address the risk of retaliation and reprisals

against people who may seek information on and participation in project activities, express concerns and/or access project-level grievance redress processes/mechanisms or UNDPs Stakeholder Response Mechanism or Social and Environmental Compliance Unit. To minimize the risk of reprisal or retaliation, the GRM will maintain confidentiality of Complainants' identities when requested, will respond to complainant concerns about reprisal or retaliation and in consultation with the Complainant bring the complaint to the Project Board and/or the UNDP Accountability Mechanism for review and action. For complaints regarding SEAH, the GRM will take additional steps as necessary to protect the confidentiality of the complainant and minimize reprisal and retaliation risks.

Without Prejudice

The existence and use of this GRM is without prejudice to any existing rights under any other complaint mechanisms that an individual or group of individuals may otherwise have access to under national or international law or the rules and regulations of other institutions, agencies or commissions

Grievance Redress Mechanism Notice

Any individual and community affected by the Project during its implementation may register their concerns or grievances by sending them to the following address:

United Nations Development Programme (UNDP)

Physical Address: UN House, Peling Lam, Kawajangsa, Thimphu
Bhutan. P.O Box No. 162

Telephone: +975 2 322424

Fax: Not Available

Email: fo.btn@undp.org

Website: www.undp.org/bhutan

Complainants will receive anonymity should they request it.

